

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF Case

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105

(S.D.N.Y.)

Estate of John P. O'Neill, Sr., on behalf John P. O'Neill, Sr., deceased, and on behalf of decedent's heirs-at-law, et al. v. Republic of Iraq., et al., Case No. 04-CV-1076 (S.D.N.Y.)

AMENDED STIPULATION AS TO SERVICE OF PROCESS, RELIEF FROM AND SETTING ASIDE OF DEFAULT, AND EXTENSION OF TIME TO RESPOND TO COMPLAINTS CONSOLIDATED UNDER MDL 1570

WHEREAS, the Plaintiffs in each of the three above-referenced cases consolidated under 03 MDL 1570 ("Plaintiffs"), and Defendant Republic of Iraq ("Republic of Iraq"), have entered into a Stipulation as to Service of Process, Relief From and Setting Aside of Default, and Extension of Time to Respond to Complaints Consolidated Under MDL 1570 ("Global Stipulation #1") that was endorsed by Judge Richard C. Casey on November 27, 2006 (MDL Docket No. 1922);

WHEREAS, pursuant to the schedule set forth in Global Stipulation #1, the Republic of Iraq sent a letter to the Plaintiffs on January 1, 2007 identifying those areas relative to which the Republic of Iraq requested supplemental pleading; and

WHEREAS, pursuant to the schedule set forth in Global Stipulation #1, Plaintiffs filed RICO Statements and More Definite Statements as to the Republic of Iraq on March 7, 2007; and

WHEREAS, the parties wish to extend the remaining deadlines set forth in Global Stipulation #1;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and the Republic of Iraq, by and through their undersigned counsel, that the deadlines set forth in Global Stipulation #1 shall be extended as follows:

- (1) The Republic of Iraq shall file a consolidated Motion to Dismiss the Complaint in each of the cases referenced above on or before July 16, 2007;
- (2) Plaintiffs shall file a consolidated Opposition to the Republic of Iraq's Motion to Dismiss on or before September 14, 2007;
 - (3) The Republic of Iraq shall file reply papers, if any, on or before October 29, 2007.

IT IS FURTHER HEREBY STIPULATED AND AGREED that all other provisions of Global Stipulation #1 remain in full force and effect.

DATED: May 21, 2007

Respectfully submitted,

COZEN O'CONNOR

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SO ORDERED:

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